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**From:** Valois Shea [valoisshea@gmail.com]  
**Sent:** 2/7/2019 8:45:23 PM  
**To:** Shea, Valois [Shea.Valois@epa.gov]  
**Subject:** OST comment on new Tech Report

Importantly, the Resource Estimate contains a map on page 60, that when compared with the FEIS map at 2-12, confirms that the expected extent of the proposed wellfields has changed, thereby altering the area likely to be impacted by Powertech's proposal. The Tribe's review of this newly discovered, but not yet formally disclosed, information is ongoing, but it appears that significant new information and changes to Powertech's project proposal require additional scrutiny under a range of federal laws, including NEPA and the National Historic Preservation Act. Importantly, Powertech has developed a new "reasonable production alternative" that is still under review, with completion expected in 2019. Report at 81-82.

Based on the Tribe's initial review, it appears that NRC Staff's review may require a hold on further work on a cultural resources survey until the new area of potential effects is delineated based on this significant and new information and ongoing Powertech alterations to the Dewey-Burdock project.